

### REMARKS

#### Indefiniteness Rejection

Claims 1, 11 and 12 are rejected as being indefinite due to the term "minimized" being used in these claims. The term "minimized" was used in claims 1, 11 and 12 in a "whereby" clause, which had no effect whatsoever on the claim scope. While Applicant believes that the use of the term "minimized" in the "whereby" clause is thus of no effect, Applicant has amended claims 1, 11 and 12 to remove the "whereby" clause.

Furthermore, claim 10 has been cancelled.

Applicant thus respectfully requests that the indefiniteness rejection be withdrawn.

#### Prior Art Rejections

Many of the claims, including all of the independent claims, have been rejected as being either anticipated by the York patent (USP 6,675,371) or as obvious over the York patent in combination with the Brown patent (USP 6,295,643). Applicant has amended some of the claims to clarify the subject matter recited therein. Particularly in view of the amendments, Applicant respectfully requests that the prior art rejections be withdrawn.

Specifically, the subject matter of the claims is directed to executing a native method in a Java virtual machine. On the other hand, the primary reference (York), discloses executing a Java virtual machine *from* a native method. That is, York's general disclosure is 180 degrees from the claimed subject matter.

Taking claim 1 as an example, the preamble of the claim specifically recites a "method of executing a native method in a Java Virtual Machine". Again, this is in contrast to what is disclosed by York – executing a Java method from a native method. See, for example, the first line of the York abstract, which states "A system for adding functionality to a graphical user

interface of a non-Java based, or native, application, using the Java programming language. A Java window, or dialog, is configured to be accessible by a native application.

To clarify this difference, Applicant has amended claims 1, 11 and 12 to recite that the determining (i.e., whether the native method is to be handled by a first native interface or one of a plurality of other native interfaces) is accomplished in the Java virtual machine. In addition, a minor amendment is made to clarify that "a" native method in the body of the various claims is "the" native method referred to in the preamble of the respective claim. Furthermore, where appropriate, "method" has been clarified to "native method." To further clarify this difference between the subject matter of the claims and what is disclosed by York, the independent claims have been amended to delete a recitation of "executing a method in the Java virtual machine," since the native method is just that – native – and may be thought of as being not part of the Java system.

In summary, then, for at least the reasons discussed above, the York patent does not disclose the features recited in Applicant's independent claims. As a result, the York patent does not anticipate the subject matter of the independent claims. For at least similar reasons, the York patent does not anticipate the subject matter of the dependent claims rejected by the Examiner.

With regard to the obviousness rejection, Applicant continues to rely on the York patent as the primary reference, invoking the Brown patent only for "the method can access or adjust an internal state of the Java virtual machine." However, as discussed above, the Examiner's basic premise regarding the York patent is incorrect, since York discloses invoking a Java system from a native application, and not invoking a native method from a Java virtual machine. Relying on Brown for "accessing an internal state of the Java virtual machine" does not cure the serious deficiency with York (and, in fact, this has not been asserted by the Examiner).

Thus, for at least these reasons, the Examiner has failed to set forth a proper prima facie case of obviousness with respect to the rejected independent claims, and with respect to the rejected dependent claims.

CONCLUSION

It is respectfully submitted that the claims, particularly as amended, are in condition for allowance. Notice to that effect is earnestly solicited.

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